



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Suite 200  
Cleveland, Ohio 44114-1839  
216/664-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY

CERTIFIED MAIL #70022030000118088091  
RETURN RECEIPT REQUESTED

September 28, 2009

Mr. Rich Guzik  
Premier Manufacturing Corporation  
12117 Bennington Avenue  
Cleveland, OH 44135

NON-HPV

FACILITY ID: 13-18-00-5421

NOTICE OF VIOLATION: Failing to Submit a Permit-to-Install/Operate (PTIO) for a new emission unit.

Dear Mr. Guzik:

On August 27, 2009, and September 9, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Premier Manufacturing Corporation located at 12117 Bennington Avenue in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations or air permit conditions.

Premier Manufacturing Corporation's operation of PVC Bake-off Oven is in violation of Ohio Revised Code 3704.05(F) and Ohio Administrative Code 3745-31-02(A)(1) for failing to submit a permit-to-install/operate (PTIO) application since September 2007.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Premier Manufacturing Corporation submit a PTIO application for the PVC Bake-off Oven to the following address:

Permit Section  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within thirty (30) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.



The appropriate permit application(s) and supplemental form(s) can be found at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

Violations of Ohio air pollution laws and/or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at (216) 420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Premier Manufacturing Corporation: 13-18-00-5421.

Sincerely,

George Baker  
Chief of Enforcement

GB/ak

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318005421\2009-8-27 NOV.doc



Premier manufacturing corporation

December 9, 2009

Mr. Andrew Kenny  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

Dear Mr. Kenny,

Please find enclosed, an application packet for the use of a burn-off oven at Premier Manufacturing Corporation located at 12117 Bennington Avenue, Cleveland, Ohio 44135.

The application packet includes:

1. General information, page 1 and 2
2. Description with calculations
3. Section I, pages 1-3
4. Section II, pages 1-10
5. EAC form 3102 for the oven. We will not be incinerating waste materials. The burn-off oven will be used to clean PVC coated hooks for our coating line.

Mrs. Adrienne LaFavre, Ohio EPA, Office of Compliance Assistance, was also very helpful with her immeasurable knowledge and explanation of the regulations.

Thank you for your patience and assistance to complete this process. Please let me know if there is any further information you may require. Contact me at telephone number (216) 941-9700 or e-mail [rguzik@premiermfg.com](mailto:rguzik@premiermfg.com).

Sincerely,

**PREMIER MANUFACTURING CORPORATION**

*Richard B. Guzik*

Richard B. Guzik  
Maintenance Manager

**CLEVELAND • CORPORATE OFFICE**

12117 Bennington Avenue, Cleveland OH 44135 • (216) 941-9700 • Fax: (216) 941-9719



**Application for Permit to Install (PTI)  
and Permit to Install/Operate (PTIO)**

Ohio Environmental Protection Agency  
Lazarus Government Center  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

For EPA Use Only

Application Number \_\_\_\_\_  
Date Received \_\_\_\_\_

**Facility Information**

Note: Application is incomplete if all **bolded** questions throughout the application are not completed.

**Legal Facility Name** PREMIER MANUFACTURING CORPORATION

**Alternate Name (if any)** \_\_\_\_\_

**Facility Physical Address** 12117 BENNINGTON AVENUE

**City, ZIP code** CLEVELAND 44135

**County** CUYAHOGA

**Facility ID** 13-18-00-5421

**Facility Description** MANUFACTURER OF WELDED WIRE PRODUCTS (FANGUARDS, GRILLES, MOTOR MOUNTS, FORMS)

**NAICS Code** 332618

**Facility Latitude** NORTH 41 degrees 25 minutes 35 seconds

**Facility Longitude** WEST - 81 degrees 46 minutes 24 seconds

**Core Place ID (if known)** \_\_\_\_\_

**SCSC ID (if known)** \_\_\_\_\_

**Portable?**  Yes  No

**Portable Type**  Asphalt Plant  Concrete Plant  Generator  Aggregate Processing  Concrete Crusher  Grinder  Other

**Initial Location County** \_\_\_\_\_ If "Other", describe: \_\_\_\_\_

**Contact Information**

No change to information on file.

<input checked="" type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
DAVID	BARNARD	(216) 941-9700	(216) 941-9719	dbarnard@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
PREMIER MFG. CORP.	Last Name	(216) 941-9700	(216) 941-9719	www.premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
RICHARD	GOZIK	(216) 941-9700	(216) 941-9719	rguzik@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input checked="" type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
PREMIER MFG. CORP.	Last Name	(216) 941-9700	(216) 941-9719	www.premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input checked="" type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
RICHARD	GOZIK	(216) 941-9700	(216) 941-9719	rguzik@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input checked="" type="checkbox"/> Responsible Official					
DONALD C.	DAWSON	(216) 941-9700	(216) 941-9719	dwdawson@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

BENNINGTON AVENUE

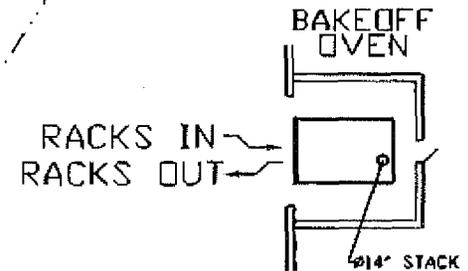
PREMIER MANUFACTURING CORP.  
12117 BENNINGTON AVENUE  
CLEVELAND, OHIO 44135

FACILITY LATITUDE & LONGITUDE  
NORTH 41deg 25min 35sec  
WEST -81deg 46min 24sec



PROCESS FLOW DESCRIPTION

- A. METAL HOOKS WITH PVC COATING ARE LOADED ON RACKS AND PLACED IN THE CONTROLLED PYROLYSIS BAKEOFF OVEN.
- B. THE FURNACE IS STARTED.
- C. THE DOORS ARE CLOSED AFTER THE AFTERBURNER LIGHTS.
- D. WHEN THE AFTERBURNER REACHES 1500°, THE MAIN CHAMBER BURNER SLOWLY HEATS THE METAL HOOKS TO 800°, DECOMPOSING THE COATING INTO SMOKE.
- E. SMOKE IS HEATED IN THE OVEN AFTERBURNER CHAMBER TO 1500°-1600°.
- F. EXHAUST GASES AND WATER VAPOR ARE EMITTED THROUGH THE INSULATED STACK.
- G. WHEN THE CLEANING PROCESS IS COMPLETED (BY A TIMER), THE OVEN IS ALLOWED TO COOL AND THE METAL HOOKS ARE REMOVED.



RAILROAD PROPERTY

PLAN VIEW

PREMIER MANUFACTURING CORP. 12117 BENNINGTON AVE CLEVELAND, OHIO 44135			
PROPERTY & BURNOFF OVEN			
DRAWN BY RBG	DATE 11-25-09	PROJECT EPA PERMIT	
ISSUE NO. N.A.	DATE EPA-11/09	OIL CHANGING PERMIT PERMIT091125	

**Descriptions and Calculations for Premier Manufacturing Corporation  
12117 Bennington Avenue, Cleveland, Ohio 44135**

Premier Manufacturing Corporation (Premier) manufactures welded wire products for the heating and air conditioning industry sector. These items include fan guards, grills, motor mounts and wire forms. Activities at Premier include a PVC powder coat line and an electro-zinc plating line.

Some of these parts are powder coated with PVC and then the coated parts undergo curing. The PVC also cures onto the bottom of the wire hooks which hold the parts in the powder coat line. The wire hooks also get coated with PVC which undergoes curing. The cured PVC is cleaned off of the hooks using a burn oven.

The oven now being used was permitted as N002. It has been rebuilt and modified extensively. In a Notice of Violation dated September 29, 2009, from Cleveland Division of Air Quality (CDAQ), Premier was asked to submit a PTIO application considering the present oven as a new unit.

The burn oven is a Pollution Control Products PRC-510. the Primary Chamber (400,000 BTU) and the Secondary Afterburner (520,000 BTU) are natural gas fired. The efficiency is over 99%. The only material burned off in the oven is cured PVC. There is essentially no ash. The dust is swept out each week.

Burn runs last from 5.5 hours to 8 hours. Premier Manufacturing Corp. usually runs one burn 6.5 hr cycle a day, five days a week and 48 weeks a year (1560 hr/yr). The rated capacity is 9.85 lb/hr. This is based on a charge of 64 pounds burned over 6.5 hours.

Pollutants of concern are PM and HCl. The permit for N002, the predecessor of this oven, were 5 ton/yr for HCl and 0.92 for PM. In 2008, 19,412 lbs of resin was cleaned in the oven. This generated 3.6 ton HCl, the pollutant of major concern.

**Emissions from Oven (920,000 BTU/hr, 64 lb/charge, 1560, 4000 and 8760 hr/yr)**

**Particulates from the burn-off**

a. From PVC

$$\begin{array}{l} \text{Charge} \quad \text{efficiency} \\ (64 \text{ lb/run}) \quad (0.01) = 0.64 \text{ lb/run} \\ (0.64 \text{ lb/day}) / 6.5 \text{ hr/run} = 0.1 \text{ lb/hr} \quad \text{OR} \end{array}$$

$$\begin{array}{l} \text{Charge} \quad \text{efficiency} \\ (9.85 \text{ lb/hr}) \quad (0.01) = 0.1 \text{ lb/hr} \end{array}$$

$$(0.1 \text{ lb/hr}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.44 \text{ ton/yr (PTE at 8760 hr/yr)}$$

$$(0.1 \text{ lb/hr}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.08 \text{ ton/yr (Actual at 1560 hr/yr)}$$

$$(0.1 \text{ lb/hr}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.2 \text{ ton/yr (Requested allowable at 4,000 hr/yr)}$$

### HCl from burn-off

Testing had been done to provide information for previous permit for N002. The files contained the following information.

Thermoclad, the PVC coating, is 58% polyvinyl chloride resin and 56.5% of the resin is chlorine. Therefore, a total of  $(0.58) \times (0.565) = 32.8\%$  of the coating converts to HCl.

Testing resulted in the following:

Run 1 – 18.78 lb HCl divided by 52 lb of coating = 36.11%

Run 2 – 17.32 lb HCl divided by 50 lb of coating = 34.64%

Run 3 – 18.14 lb HCl divided by 46 lb of coating = 39.43%

The average % of coating converted to HCl to be used in the calculations is 36.7%.

$(64 \text{ lb/charge}) (0.367) = 23.5 \text{ lb HCl/day}$

$(23.5 \text{ lb HCl}) / (6.5 \text{ hr/day}) = 3.9 \text{ lb/hr}$

$(3.9 \text{ lb HCl}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 17.1 \text{ ton/yr (PTE at 8760 hr/yr)}$

$(3.9 \text{ lb HCl}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 3.05 \text{ ton/yr (Actual at 1560 hr/yr)}$

$(3.9 \text{ lb HCl}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 7.8 \text{ ton/yr (Requested allowable at 4,000 hr/yr)}$

### Emissions from burning a natural gas

Emission factors per AP-42 are in the table below.

Pollutant	Emission factor lb/10 <sup>6</sup> scf per AP-42	Emission factors for 0.920 MM BTU/hr*	Emissions for 1560 hr/yr (ton/yr)	Emissions for 4000 hr/yr (ton/yr)	Emissions for 8760 hr/yr (ton/yr)
PM10	7.6	0.007	0.006	0.014	0.03
NOx	100	0.091	0.071	0.181	0.40
CO	84	0.076	0.06	0.16	0.34
SO <sub>2</sub>	0.6	0.0006	0.0005	0.0012	0.0024
VOC	5.5	0.005	0.004	0.010	0.022
Lead	0.0005	0.00000045	0.0000004	0.0000009	0.000002

\*1 lb / 10<sup>6</sup> scf / 1020 = 1 lb/ MMBTU

### **Total for Particulate**

Combustion of natural gas

PVC

$(0.007 \text{ lb/hr}) + (0.1 \text{ lb/hr}) = 0.1007$

$(0.1007 \text{ lb/hr}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.08 \text{ ton/yr}$

$(0.1007 \text{ lb/hr}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.44 \text{ ton/yr}$

$(0.1007 \text{ lb/hr}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.2 \text{ ton/yr (Requested allowable at 4,000 hr/yr)}$



**Division of Air Pollution Control**  
**Application for Permit-to-Install or Permit-to-Install and Operate**

**Section I - General Application Information**

*This section should be filled out for each permit to install (PTI) or Permit to Install and Operate (PTIO) application. A PTI is required for all air contaminant sources (emissions units) installed or modified after January 1, 1974 that are subject to OAC Chapter 3745-77. A PTIO is required for all air contaminant sources (emissions units) that are not subject to OAC Chapter 3745-77 (Title V). See the application instructions for additional information.*

For OEPA use only:	<input type="checkbox"/> Installation	<input type="checkbox"/> Request Federally enforceable restrictions
	<input type="checkbox"/> Modification	<input type="checkbox"/> General Permit
	<input type="checkbox"/> Renewal	<input type="checkbox"/> Other

1. Is the purpose of this application to transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (PTIO)?

yes       no

2. **Establish PER Due Date** - Select an annual Permit Evaluation Report (PER) due date for this facility (does not apply to facilities subject to Title V, OAC Chapter 3745-77). If the PER has previously been established and a change is now desired, a PER Change Request form must be filed instead of selecting a date here.

<u>Due Date:</u>	<u>For Time Period:</u>
<input checked="" type="checkbox"/> February 15	January 1 through December 31
<input type="checkbox"/> May 15	April 1 through March 31
<input type="checkbox"/> August 15	July 1 through June 30
<input type="checkbox"/> November 15	October 1 through September 30

PER not applicable (Title V) or due date already established  
 PER Request Permit Change form attached

3. **Federal Rules Applicability** - Please check all of the appropriate boxes below:

**New Source Performance Standards (NSPS)**  
*New Source Performance Standards are listed under 40 CFR 60 - Standards of Performance for New Stationary Sources.*

not affected     subject to Subpart: \_\_\_\_\_  
 unknown         exempt - explain below

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**  
*National Emissions Standards for Hazardous Air Pollutants are listed under 40 CFR 61. (These include asbestos, benzene, beryllium, mercury, and vinyl chloride).*

not affected     subject to Subpart: \_\_\_\_\_  
 unknown         subject, but exempt - explain below

**Maximum Achievable Control Technology (MACT)**  
*The Maximum Achievable Control Technology standards are listed under 40 CFR 63 and OAC rule 3745-31-28.*

not affected     subject to Subpart: \_\_\_\_\_  
 unknown         subject, but exempt - explain below

**Prevention of Significant Deterioration (PSD)**  
*These rules are found under OAC rule 3745-31-10 through OAC rule 3745-31-20.*

not affected     subject to regulation  
 unknown

**Non-Attainment New Source Review**  
*These rules are found under OAC rule 3745-31-21 through OAC rule 3745-31-27.*

not affected     subject to regulation  
 unknown

**112 (r) - Risk Management Plan**  
*These rules are found under 40 CFR 68.*

not affected     subject to regulation  
 unknown

**Title IV (Acid Rain Requirements)**  
*These rules are found under 40 CFR 72 and 40 CFR 73.*

not affected     subject to regulation  
 unknown



8. **Authorized Signature** – OAC rule 3745-31-04 states that applications for permits to install or permits to install and operate shall be signed:

- (1) In the case of a corporation, by a principal executive officer of at least the level of vice president, or his duly authorized representative, if such representative is responsible for the overall operation of the facility.
- (2) In the case of a partnership by a general partner.
- (3) In the case of sole proprietorship, by the proprietor, and
- (4) In the case of a municipal, state, federal or other governmental facility, by the principal executive officer, the ranking elected official, or other duly authorized employee.

Under OAC rule 3745-31-04, this signature shall constitute personal affirmation that all statements or assertions of fact made in the application are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.



12/9/09

Authorized Signature (for facility)

Date

**D.C. DAWSON**

**VICE PRESIDENT**

Print Name

Title

**Section II - Specific Air Contaminant Source Information**

Facility ID: 13-18-00-5421

Emissions Unit ID: \_\_\_\_\_

Company Equipment ID: 13002

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** – Check all that apply (must be completed regardless of date of installation or modification):

New installation (for which construction has not yet begun, in accordance with OAC rule 3745-31-33). When will you begin to install the air contaminant source?

(month/year) \_\_\_\_\_ **OR** 9 after installation permit has been issued

Initial application for an air contaminant source already installed or under construction. Identify installation date or the date construction began (month/year) JULY, 2007 and the date operation began (month/year) SEPT., 2007

Modification to an existing air contaminant source/facility (for which modification has not yet begun) - List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

**REBUILT N002 - FORMERLY PERMITTED UNIT**

When will you begin to modify the air contaminant source? (month/year) \_\_\_\_\_ **OR** 9 after modification permit has been issued

Modification application for an air contaminant source which has been or is currently being modified. List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

Identify modification date or the date modification began (month/year) \_\_\_\_\_ and the date operation began (month/year) \_\_\_\_\_

Reconstruction of an existing air contaminant source/facility. Please explain: \_\_\_\_\_

Renewal of an existing permit-to-operate (PTO) or PTIO

Identify the date operation began after installation or latest modification (month/year) \_\_\_\_\_

General Permit    General Permit Category \_\_\_\_\_    General Permit Type \_\_\_\_\_

Complete, sign and attach the appropriate Qualifying Criteria Document

Other, please explain: \_\_\_\_\_

**Section II - Specific Air Contaminant Source Information**

Facility ID: 13-16-00-5421

Emissions Unit ID: \_\_\_\_\_

Company Equipment ID: 3002

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

40202505

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.

- If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if "Emissions before controls (max), lb/hr" multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
- Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, "Emissions before controls" will be the same as "Actual emissions".
- Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
- If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
- Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions* (lb/hr)	Actual emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0.1007	0.1007	0.08	0.1007	0.2
PM # 10 microns in diameter (PE/PM <sub>10</sub> )					
PM # 2.5 microns in diameter (PE/PM <sub>2.5</sub> )					
Sulfur dioxide (SO <sub>2</sub> )	0.0006	0.0006	0.0005	0.0006	0.0012
Nitrogen oxides (NO <sub>x</sub> )	0.091	0.091	0.071	0.091	0.182
Carbon monoxide (CO)	0.076	0.076	0.06	0.076	0.16
Organic compounds (OC)	0.005	0.005	0.004	0.005	0.10
Volatile organic compounds (VOC)	0.005	0.005	0.004	0.005	0.10
Lead (Pb)	0.00000045	0.00000045	0.0000004	0.00000045	0.0000009
Total Hazardous Air Pollutants (HAPs)	3.9	3.9	3.05	3.9	7.8
Highest single HAP: HCl	3.9	3.9	3.05	3.9	7.8
Toxic Air Contaminants (see Instructions):					

\* Provide your calculations as an attachment and explain how all process variables and emission factors were selected. Note the emission factor(s) employed and document origin. Example: AP-42, Table 4.4-3 (8/97); stack test, Method 5, 4/96; mass balance based on MSDS; etc.

**PLEASE SEE ADDITIONAL SHEETS WITH FACILITY DESCRIPTION**

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

SECONDARY AFTERBURNER

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?

- Yes - fill out the applicable information below.  
 No - proceed to Question 6.

**Section II - Specific Air Contaminant Source Information**

Facility ID: 13-18-00-5421

Emissions Unit ID: \_\_\_\_\_

Company Equipment ID: B002

Wet Scrubber  
 Manufacturer: \_\_\_\_\_ Year installed: \_\_\_\_\_ Your ID for control equipment \_\_\_\_\_

Describe this control equipment:

Pollutant(s) controlled:  PE/PM  PE/PM<sub>10</sub>  PE/PM<sub>2.5</sub>  OC  VOC  
 SO<sub>2</sub>  NO<sub>x</sub>  CO  Pb  Other \_\_\_\_\_

Estimated capture efficiency (%): \_\_\_\_\_ Basis for efficiency: \_\_\_\_\_

Design control efficiency (%): \_\_\_\_\_ Basis for efficiency: \_\_\_\_\_

Operating control efficiency (%): \_\_\_\_\_ Basis for efficiency: \_\_\_\_\_

Operating pressure drop range (inches of water): Minimum: \_\_\_\_\_ Maximum: \_\_\_\_\_

Type:  Impingement  Packed bed  Spray chamber  Venturi  Other: \_\_\_\_\_

pH range for scrubbing liquid: Minimum: \_\_\_\_\_ Maximum: \_\_\_\_\_

Is scrubber liquid recirculated?  Yes  No

Scrubber liquid flow rate (gal/min): \_\_\_\_\_

Scrubber liquid supply pressure (psig): \_\_\_\_\_ NOTE: This item for spray chambers only.

Inlet gas flow rate (acfm): \_\_\_\_\_ Outlet gas flow rate (acfm): \_\_\_\_\_

Inlet gas temperature (°F): \_\_\_\_\_ Outlet gas temperature (°F): \_\_\_\_\_

This is the only control equipment on this air contaminant source

If not, this control equipment is:  Primary  Secondary  Parallel

List all other air contaminant sources that are also vented to this control equipment: \_\_\_\_\_

List all egress point IDs (from Table 7-A) associated with this control equipment: \_\_\_\_\_

Other

Type: describe BURN OVEN WITH SECONDARY CHAMBER - CONTROLLED PYROLYSIS

Manufacturer: POLLUTION CONTROL PRODUCTS Year installed: 2007 Your ID for control equipment B002

Describe this control equipment: AFTERBURNER

Pollutant(s) controlled:  PE/PM  PE/PM<sub>10</sub>  PE/PM<sub>2.5</sub>  OC  VOC  
 SO<sub>2</sub>  NO<sub>x</sub>  CO  Pb  Other \_\_\_\_\_

Estimated capture efficiency (%): 99+ Basis for efficiency: MANUFACTURER'S SPECS

Design control efficiency (%): 99+ Basis for efficiency: MANUFACTURER'S SPECS

Operating control efficiency (%): 99 Basis for efficiency: \_\_\_\_\_

This is the only control equipment on this air contaminant source

If not, this control equipment is:  Primary  Secondary  Parallel

List all other air contaminant sources that are also vented to this control equipment: \_\_\_\_\_

List all egress point IDs (from Table 7-A) associated with this control equipment: BURN OFF OVEN EXHAUST STACK

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.

**PLEASE SEE FACILITY DESCRIPTION DRAWING**

7. **Modeling information:** (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required.) An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohio's Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPC's Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.

Complete Tables 7-A and 7-C for stack emissions egress points and/or Table 7-B and 7-C for fugitive emissions egress points below if the requested allowable annual emission rate for this PTI or PTIO exceeds any of the following:

- Particulate Emissions (PE/PM<sub>10</sub>): 10 tons per year
- Sulfur Dioxide (SO<sub>2</sub>): 25 tons per year
- Nitrogen Oxides (NO<sub>x</sub>): 25 tons per year
- Carbon Monoxide (CO): 100 tons per year
- Lead (Pb): 0.6 ton per year
- Toxic Air Contaminants: 1 ton per year. Toxic air contaminants are identified in OAC rule 3745-114-01.

**Section II - Specific Air Contaminant Source Information**

Facility ID: 13-18-00-5421

Emissions Unit ID: \_\_\_\_\_

Company Equipment ID: B002

Complete Table 7-A below for each stack emissions egress point. An egress point is a point at which emissions from an air contaminant source are released into the ambient (outside) air. List each individual egress point on a separate pair of lines. In each case, use the dimensions of the tallest nearby (or attached) building, building segment or structure.

**Table 7-A, Stack Egress Point Information**

① Company ID for the Egress Point  <b>B002</b>	Type Code*  <b>B</b>	Dimensions or Diameter  <b>14" I.D.</b>	Height from the Ground (ft)  <b>32'</b>	Temp. at Max. Operation (F)  <b>1550°</b>	Flow Rate at Max. Operation (ACFM)  <b>350</b>	Minimum Distance to Fence Line (ft)  <b>57'</b>
Company Description for the Egress Point  <b>BURNOFF OVEN STACK</b>	Shape: round, square, rectangular  <b>ROUND</b>	Cross Sectional Area  <b>154 in<sup>2</sup></b>	Base Elevation (ft)  <b>0</b>	Building Height (ft)  <b>17'</b>	Building Width (ft)  <b>20' 4"</b>	Building Length (ft)  <b>16' 8"</b>

② Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

③ Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

④ Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

\*Type codes for stack egress points:

- A. vertical stack (unobstructed): There are no obstructions to upward flow in or on the stack such as a rain cap.
- B. vertical stack (obstructed): There are obstructions to the upward flow, such as a rain cap, which prevents or inhibits the air flow in a vertical direction.
- C. non-vertical stack: The stack directs the air flow in a direction which is not directly upward.

Complete Table 7-B below for each fugitive emissions egress point. List each individual egress point on a separate line. Refer to the description of the fugitive egress point types below the table for use in completing the type column of the table. For an air contaminant source with multiple fugitive emissions egress points, include only the primary egress points.

**Table 7-B, Fugitive Egress Point Information**

① Company ID or Name for the Egress Point  <p style="text-align: center; font-size: 1.2em;"><b>NONE</b></p>	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

② Company ID or Name for the Egress Point	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

③ Company ID or Name for the Egress Point	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

\*Types for fugitive egress point:

**Area:** an open fugitive source characterized as a horizontal area (L x W) with a release height. For irregular surfaces such as storage piles, enter dimensions of an average cross section; release height is entered as half of the maximum pile height. For process sources such as crushers, use the process opening (e.g., area of crusher hopper opening) and ignore material handling and storage emissions points.

**Volume:** an unpowered vertical opening, such as a window or roof monitor, characterized as a vertical area (W x H) with a release height, measured at the midpoint of the opening. Multiple openings in a building may be averaged, if necessary.

Use the same Company Name or ID for the Egress Point in Table 7-C that was used in Table 7-A or 7-B. See the line-by-line PTI/PTIO instructions for additional information.

**Table 7-C, Egress Point Location**

Company Name or ID for the Egress Point (as identified above)	Egress Point Latitude			Egress Point Longitude		
<b>BURNOFF OVEN STACK</b>	<b>41</b> deg	<b>25</b> min	<b>35</b> sec	<b>-81</b> deg	<b>46</b> min	<b>24</b> sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec
	deg	min	sec	deg	min	sec

**Section II - Specific Air Contaminant Source Information**

Facility ID: 13-18-00-5421

Emissions Unit ID: \_\_\_\_\_

Company Equipment ID: B002

8. Request for Enforceable Restrictions - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting state-only enforceable limits or state and federally enforceable limits to obtain synthetic minor status)?

- yes
- no
- not sure - please contact me to discuss whether this affects the facility.

If yes, why are you requesting enforceable restrictions? Check all that apply.

- a. to avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)
- b. to avoid being a major MACT source (see OAC rule 3745-31-01)
- c. to avoid being a major stationary source (see OAC rule 3745-31-01)
- d. to avoid being a major modification (see OAC rule 3745-31-01)
- e. to avoid an air dispersion modeling requirement (see Engineering Guide # 69)
- f. to avoid BAT requirements (see OAC rule 3745-31-05(A)(3)(b))
- g. to avoid another requirement. Describe: \_\_\_\_\_

If you checked a., b. or c., please attach a facility-wide potential to emit (PTE) analysis (for each pollutant) and synthetic minor strategy to this application. (See application instructions for definition of PTE.) If you checked d., please attach a net emission change analysis to this application. If you checked e., f. or g., please attach a description of the restrictions proposed and how compliance with those restrictions will be verified.

9. Continuous Emissions Monitoring -- Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.

- yes
- no

If yes, complete the following information.

Company Name or ID for the Egress Point \_\_\_\_\_

CEM Description \_\_\_\_\_

This CEM monitors (check all that apply):

9 Opacity 9 Flow 9 CO 9 NOx 9 SO<sub>2</sub> 9 THC 9 HCl 9 HF 9 H<sub>2</sub>S 9 TRS 9 CO<sub>2</sub> 9 O<sub>2</sub> 9 PM

10. **EAC Forms** - The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source unless a general permit is being requested. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.

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## EMISSIONS ACTIVITY CATEGORY FORM INCINERATOR (WASTE COMBUSTION) OPERATION

*This form is to be completed for each incinerator (waste combustion). State/Federal regulations which may apply to incinerator (waste combustion) operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.*

1. Reason this form is being submitted (Check one)

New Permit       Renewal or Modification of Air Permit Number(s) (e.g. N001) \_\_\_\_\_

2. Maximum Operating Schedule: 24 hours per day; 365 days per year

If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. \_\_\_\_\_

3. Waste Type:  Municipal/Residential/Industrial  
 Hospital, Medical, or Infectious  
 Sewage Sludge  
 Human or Animal Remains (Crematory)  
 Hazardous  
 Salvageable Material  
 Other (describe) BURNOFF OVEN FOR PVC

4. Type of incinerator:

Mass Burn/Modular Excess Air       Mass Burn Waterwall  
 Mass Burn Rotary Waterwall       Mass Burn Refractory Wall  
 Refuse-Derived Fuel-Fired       Mass Burn Modular Starved Air  
 Fluidized Bed       Multiple Hearth  
 Electric Infrared       Burn-off Oven  
 Industrial/Commercial Multiple Chamber  
 Industrial/Commercial Single Chamber  
 Other (describe) \_\_\_\_\_

5. Rated capacity: 9.85 lbs/hr  
0.064 tons/day

6. Method of charging:  Chute fed       Mechanical loader  
 Flue fed       Manual  
 Other, describe: \_\_\_\_\_

7. Type of charging:  Continuous       Batch       Intermittent

8. Weigh Scale:  Yes       No

